



January 30, 2014

Davindra Singh
CBUS Ops Inc. (dba Woodbridge Winery)
5950 East Woodbridge Road
Acampo, CA 95220

Re: Notice of Minor Title V Permit Modification
District Facility # N-2321
Project # N-1140142

Dear Mr. Singh:

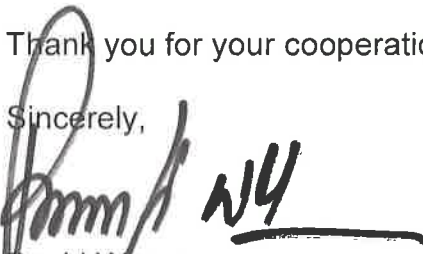
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-2321-649-2 into the Title V operating permit. The proposed project was to designate the 122 bhp Energy Now model ENI65 digester gas/natural gas-fired rich-burn IC engine as a dormant emissions unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-2321-649-2, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Ruphi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,


David Warner
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Title V APPLICATION REVIEW

Minor Modification

Date: January 29, 2014
Facility Number: N-2321
Facility Name: CBUS Ops, Inc. (DBA Woodbridge Winery)
Mailing Address: 5950 East Woodbridge Road
Acampo, CA 95220

Contact Name: Davindra Singh
Phone: (209) 365 – 8048
E-Mail: Davindra.singh@cbrands.com

Responsible Official: Jim Crandell
Title: Facilities Director

Processing Staff: Wai-Man So
Project Number: N-1140142

I. PROPOSAL

CBUS Ops, Inc. (DBA Woodbridge Winery) hereinafter CBUS is proposing a Title V minor modification to incorporate the recently issued Authority to Construct (ATC) N-2321-649-2 into the Title V operating permit. The applicant proposes to designate the 122 bhp Energy Now model ENI65 digester gas/natural gas-fired rich-burn IC engine as a dormant emissions unit.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 5950 East Woodbridge Road in Acampo, California.

III. EQUIPMENT DESCRIPTION

122 HP ENERGY NOW MODEL ENI65 DIGESTER GAS OR NATURAL GAS-FIRED RICH-BURN IC ENGINE SERVED BY JOHNSON MATTHEY BANDITO CATALYTIC CONVERTER POWERING AN ELECTRICAL GENERATOR WITH DRY ABSORPTION H₂S REMOVAL SYSTEM SHARED WITH PERMIT UNITS N-2321-650 AND '651: DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT.

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

District Rule 2520 Federally Mandated Operating Permits (06/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

CBUS has received an ATC N-2321-649-2 to designate an existing 122 bhp Energy Now model ENI65 digester gas/natural gas-fired IC rich-burn IC engine as a dormant emissions unit. The subject unit is currently inoperable because of the mechanical failure on the electrical generator. A copy of this ATC is enclosed in Appendix II of this document.

Changes to PTO N-2321-649-1:

The following permit conditions were added during the issuance of ATC N-2321-649-2:

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080]
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
4. While dormant, normal source testing shall not be required. [District Rule 2080]
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]

Changes to ATC N-2321-649-2:

1. Condition # 1 states, "The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]".

The applicant has submitted the application to modify the Title V permit on January 21, 2014. Therefore, the condition listed above has been removed from the permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix V) ;

2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix IV).

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Modified Title V Operating Permit No. N-2321-649-3
Appendix II: Authority to Construct N-2321-649-2
Appendix III: Permit to Operate N-2321-649-1
Appendix IV: Permit Application
Appendix V: Emissions Change

Appendix I

Proposed Modified Title V Operating Permit No. N-2321-649-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-649-3

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

122 HP ENERGY NOW MODEL ENI65 DIGESTER GAS OR NATURAL GAS-FIRED RICH-BURN IC ENGINE SERVED BY JOHNSON MATTHEY BANDITO CATALYTIC CONVERTER POWERING AN ELECTRICAL GENERATOR WITH DRY ABSORPTION H₂S REMOVAL SYSTEM SHARED WITH PERMIT UNITS N-2321-650 AND '651: DESIGNATE AS A DORMANT EMISSIONS UNIT

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. This engine shall only be fired on PUC-quality natural gas and/or digester gas. [District Rule 4702] Federally Enforceable Through Title V Permit
11. Digester gas fuel to the IC engine shall be treated by a dry absorption system for removal of H₂S. Maximum H₂S concentration in the treated digester gas shall be 25 ppmvd. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
12. The dry absorption system for H₂S removal shall utilize a minimum of two absorbent beds to allow leaving at least one absorbent bed operational during periodical change out of absorbent. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Emissions from this IC engine shall not exceed any of the following limits: 11 ppmvd NOx @ 15% O2 (equivalent to 0.15 g-NOx/hp-hr), 0.0233 g-SOx/hp-hr, 0.158 g-PM10/hp-hr, 70 ppmvd CO @ 15% O2 (equivalent to 0.60 g-CO/hp-hr), or 51 ppmvd VOC @ 15% O2 (equivalent to 0.25 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
14. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
15. If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4702] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
18. Testing to demonstrate compliance with the digester gas fuel sulfur content shall be conducted weekly using draeger tubes. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Records of all monitoring and source testing results shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing to measure digester gas-combustion NOx, CO, and VOC emissions shall be conducted at least once every 24 months and shall be performed during the annual grape crush operational period at this facility. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
21. The permittee shall perform an annual digester gas fuel sulfur analysis in accordance with the test methods specified within this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
22. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The following test methods shall be used, or any other method approved by the EPA and the APCO: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100; SO_x - EPA Method 6C, 8 or ARB Method 100; and total sulfur, as hydrogen sulfide (H₂S) - EPA Method 11 or 15, as appropriate [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
28. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II

Authority to Construct N-2321-649-2



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2321-649-2

ISSUANCE DATE: 01/28/2014

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF 122 HP ENERGY NOW MODEL ENI65 DIGESTER GAS OR NATURAL GAS-FIRED RICH-BURN IC ENGINE SERVED BY JOHNSON MATTHEY BANDITO CATALYTIC CONVERTER POWERING AN ELECTRICAL GENERATOR WITH DRY ABSORPTION H₂S REMOVAL SYSTEM SHARED WITH PERMIT UNITS N-2321-650 AND N-651: DESIGNATE AS A DORMANT EMISSIONS UNIT

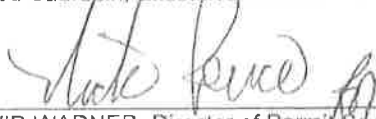
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080]
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
4. While dormant, normal source testing shall not be required. [District Rule 2080]
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-2321-649-2 Jan 28 2014 2:03PM - SOW Joint Inspection NOT Required

9. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702]
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
11. This engine shall only be fired on PUC-quality natural gas and/or digester gas. [District Rule 4702]
12. Digester gas fuel to the IC engine shall be treated by a dry absorption system for removal of H₂S. Maximum H₂S concentration in the treated digester gas shall be 25 ppmvd. [District Rules 2201 and 4702]
13. The dry absorption system for H₂S removal shall utilize a minimum of two absorbent beds to allow leaving at least one absorbent bed operational during periodical change out of absorbent. [District Rule 2201]
14. Emissions from this IC engine shall not exceed any of the following limits: 11 ppmvd NO_x @ 15% O₂ (equivalent to 0.15 g-NO_x/hp-hr), 0.0233 g-SO_x/hp-hr, 0.158 g-PM₁₀/hp-hr, 70 ppmvd CO @ 15% O₂ (equivalent to 0.60 g-CO/hp-hr), or 51 ppmvd VOC @ 15% O₂ (equivalent to 0.25 g-VOC/hp-hr). [District Rules 2201 and 4702]
15. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702]
16. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4702]
17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702]
18. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]
19. Testing to demonstrate compliance with the digester gas fuel sulfur content shall be conducted weekly using draeger tubes. [District Rule 2201]
20. Records of all monitoring and source testing results shall be maintained. [District Rule 2201]
21. Source testing to measure digester gas-combustion NO_x, CO, and VOC emissions shall be conducted at least once every 24 months and shall be performed during the annual grape crush operational period at this facility. [District Rules 2201 and 4311]
22. The permittee shall perform an annual digester gas fuel sulfur analysis in accordance with the test methods specified within this permit. [District Rule 4702]
23. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]

CONDITIONS CONTINUE ON NEXT PAGE

24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702]
25. The following test methods shall be used, or any other method approved by the EPA and the APCO: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100; SO_x - EPA Method 6C, 8 or ARB Method 100; and total sulfur, as hydrogen sulfide (H₂S) - EPA Method 11 or 15, as appropriate [District Rules 1081 and 4702]
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
28. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702]
29. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702]
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702]

Appendix III

Permit to Operate N-2321-649-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-649-1

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

122 HP ENERGY NOW MODEL ENI65 DIGESTER GAS OR NATURAL GAS-FIRED RICH-BURN IC ENGINE SERVED BY JOHNSON MATTHEY BANDITO CATALYTIC CONVERTER POWERING AN ELECTRICAL GENERATOR WITH DRY ABSORPTION H₂S REMOVAL SYSTEM SHARED WITH PERMIT UNITS N-2321-650 AND '651

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
2. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. This engine shall only be fired on PUC-quality natural gas and/or digester gas. [District Rule 4702] Federally Enforceable Through Title V Permit
5. Digester gas fuel to the IC engine shall be treated by a dry absorption system for removal of H₂S. Maximum H₂S concentration in the treated digester gas shall be 25 ppmvd. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
6. The dry absorption system for H₂S removal shall utilize a minimum of two absorbent beds to allow leaving at least one absorbent bed operational during periodical change out of absorbent. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed any of the following limits: 11 ppmvd NO_x @ 15% O₂ (equivalent to 0.15 g-NO_x/hp-hr), 0.0233 g-SO_x/hp-hr, 0.158 g-PM₁₀/hp-hr, 70 ppmvd CO @ 15% O₂ (equivalent to 0.60 g-CO/hp-hr), or 51 ppmvd VOC @ 15% O₂ (equivalent to 0.25 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
8. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4702] Federally Enforceable Through Title V Permit
10. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
12. Testing to demonstrate compliance with the digester gas fuel sulfur content shall be conducted weekly using draeger tubes. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of all monitoring and source testing results shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Source testing to measure digester gas-combustion NO_x, CO, and VOC emissions shall be conducted at least once every 24 months and shall be performed during the annual grape crush operational period at this facility. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
15. The permittee shall perform an annual digester gas fuel sulfur analysis in accordance with the test methods specified within this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
16. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
18. The following test methods shall be used, or any other method approved by the EPA and the APCO: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100; SO_x - EPA Method 6C, 8 or ARB Method 100; and total sulfur, as hydrogen sulfide (H₂S) - EPA Method 11 or 15, as appropriate [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
22. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix IV

Permit Application



San Joaquin Valley Air Pollution Control District
www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>CBS Ops Inc. (DBA WOODBRIDGE WINGR)</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>5450 E Woodbridge Rd</u> CITY: <u>Arampco</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95220</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Same as above</u> CITY: _____ ____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: _____
4. GENERAL NATURE OF BUSINESS:	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Apply for a dormant emission unit (DEU) for the following PTO:</u> <u>N-2321-6491</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Darinda Singh</u>	TITLE OF APPLICANT: <u>Sr. Engineer</u>
7. SIGNATURE OF APPLICANT: <u>[Signature]</u>	DATE: <u>1/16/2014</u> PHONE: () FAX: () EMAIL: _____

For APCD-Use Only:

DATE STAMP <u>JAN 21 2014</u> SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____
	DATE PAID: _____ PROJECT NO: <u>N1140142</u> FACILITY ID: <u>N-2321</u>

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061



San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME: <u>CRS Operations Inc.</u>	FACILITY ID: <u>N-2321</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner: <u>Davinder Singh</u>	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

J. Crandell

Signature of Responsible Official

1/16/2014

Date

Jim Crandell

Name of Responsible Official (please print)

Facilities Director

Title of Responsible Official (please print)

Appendix V

Emissions Change

Emissions Change:

The proposed modification, to designate the IC engine as a compliant dormant emissions unit results no change of potential emissions from the subject unit.